

**SLO CELLULAR, INC. D/B/A
CELLULAR ONE OF SAN LUIS OBISPO
733 Marsh Street
San Luis Obispo, California 93401**

**Marlene H. Dortch, Secretary
Office of the Secretary
445 - 12th Street, S.W.
Washington, D.C. 20554**

**Attention: Patrick Forster, Senior Engineer
Room 3-A104
Policy Division
Wireless Telecommunications Bureau**

**Re: Implementation Plan of Wireless E-911 Phase II
Automatic Location Identification
Notice Pertaining to CC Docket No. 94-102**

AMENDED E-911 PHASE II STATUS REPORT

Dear Ms. Dortch:

In November of 2000, we filed with the Commission our "E-911 Phase II Status Report" in accordance with the Third Report and Order in CC Docket No. 94-102 and the Commission's related Public Notice, Mimeo DA 00-2099, released September 14, 2000, which described the status of our implementation plans for wireless E-911 Phase II Automatic Location Information ("ALI"). A "Revised E-911 Phase II Status Report" was filed with the Commission on November 29, 2001. Supplements were filed on February 7, 2002 and September 26, 2003. All of these filings are collectively referred to herein as "the Report."

At the request of the Telecommunications Division of the California Department of General Services (the state agency responsible for California's E-911 planning and roll-out functions), we hereby submit an amended report containing minor revisions from the information contained in the previously-filed Report. The amended report is as follows:

Background/Contact Information

1) Carrier Identifying Information:

SLO Cellular, Inc. d/b/a Cellular One of San Luis Obispo
TRS Number: 809306

2) Contact Information: David Pruett, Vice Presidnet
SLO Cellular, Inc. d/b/a Cellular One of San Luis Obispo
733 Marsh Street
San Luis Obispo, California 93401
Tel: 805-543-0100
FAX: 805-781-3478
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and

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E-911 Phase II Location Technology Information

1) **Type of Technology**: As stated in the Report, we intend to deploy a network-based E-911 Phase II ALI solution.

The State of California has consolidated its E-911 planning and roll-out functions in a single state agency (the Telecommunications Division of the California Department of General Services, as noted above), which has decided to deploy Phase I ALI and Phase II ALI simultaneously, instead of in separate steps. Among other things, the state agency will coordinate the roll-out of E-911 Phase I and Phase II ALI between the Public Safety Answering Points ("PSAPs") and the wireless carriers operating in the state. At present, it appears likely that we will deploy either the Grayson Wireless Division of Allen Telecom, or the TruePosition E-911 Phase II network-based ALI solution.

In addition, local governments in our operating area stringently regulate the placement of additional antennas on existing towers, and obtaining the required governmental approvals can be an unduly prolonged and time consuming process frequently entailing more than six months to complete. Therefore, absent preemption of these local requirements by the State of California, our ability to

deploy Phase II ALI in a timely manner will be subject to and conditioned upon our ability to expeditiously obtain from the relevant local authorities the approvals needed to install the ALI antennas on the existing towers which serve as our cell site locations.

The final selection of equipment will be based upon a combination of coordination with the state agency, pricing, technical suitability, and receipt of an acceptable equipment delivery date, once the equipment is made commercially available to small carriers.

2) **Testing and Verification**: With respect to the actual deployment of a commercial system, there is very little usable information available to small carriers from the vendors. Accordingly, it is difficult to devise a testing methodology for a commercial system. We intend to purchase a "turn-key" system, with testing and verification performed by the manufacturer prior to our acceptance of the installation. Thereafter, we anticipate regular testing of random locations throughout our service area, beginning in areas where the PSAP has requested Phase II deployment.

However, notwithstanding the foregoing, the following testing and verification methodology looks promising: Each individual wireless base station will have test calls placed on it utilizing various models of portable and 3 watt subscriber units. These tests will be performed using both AMPS and TDMA handsets. The geographic location of the subscriber unit can be verified by using a separate, handheld GPS receiver and comparing the coordinates against the coordinates identified using the ALI equipment's location determination subroutine.

3) **Implementation Details and Schedule**: We plan to adhere to the implementation schedule established by the Commission. However, our ability to do so will depend, in large measure, on the ability of equipment manufacturers to have their products operational and delivered in a timely manner to small carriers. It is anticipated that the equipment installation will be performed by the equipment vendor under a "turn-key" contract.

4) **PSAP Interface**: We anticipate that the PSAP interface will be as requested by the state agency.

5) **Existing Handsets**: Not applicable.

6) **Location of Non-Compatible Handsets**: Not applicable.

7) **Other Information**: Our switch has Phase I ALI capability but, as noted above, the State of California has decided to deploy Phase I ALI and Phase II ALI simultaneously, rather than in separate steps. We have received no PSAP requests for Phase I or Phase II ALI.

As reflected on Attachment A hereto (an E-911 roll-out map, dated September 2, 2003, prepared by the Telecommunications Division of the California Department of General Services), we will not receive any E-911 requests for our area (i.e., San Luis Obispo County) until Calendar Year


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2005 at the earliest. Previously, the State of California had indicated that we could expect to receive an E-911 request in either Calendar Year 2004 or Calendar Year 2005.

Respectfully submitted,

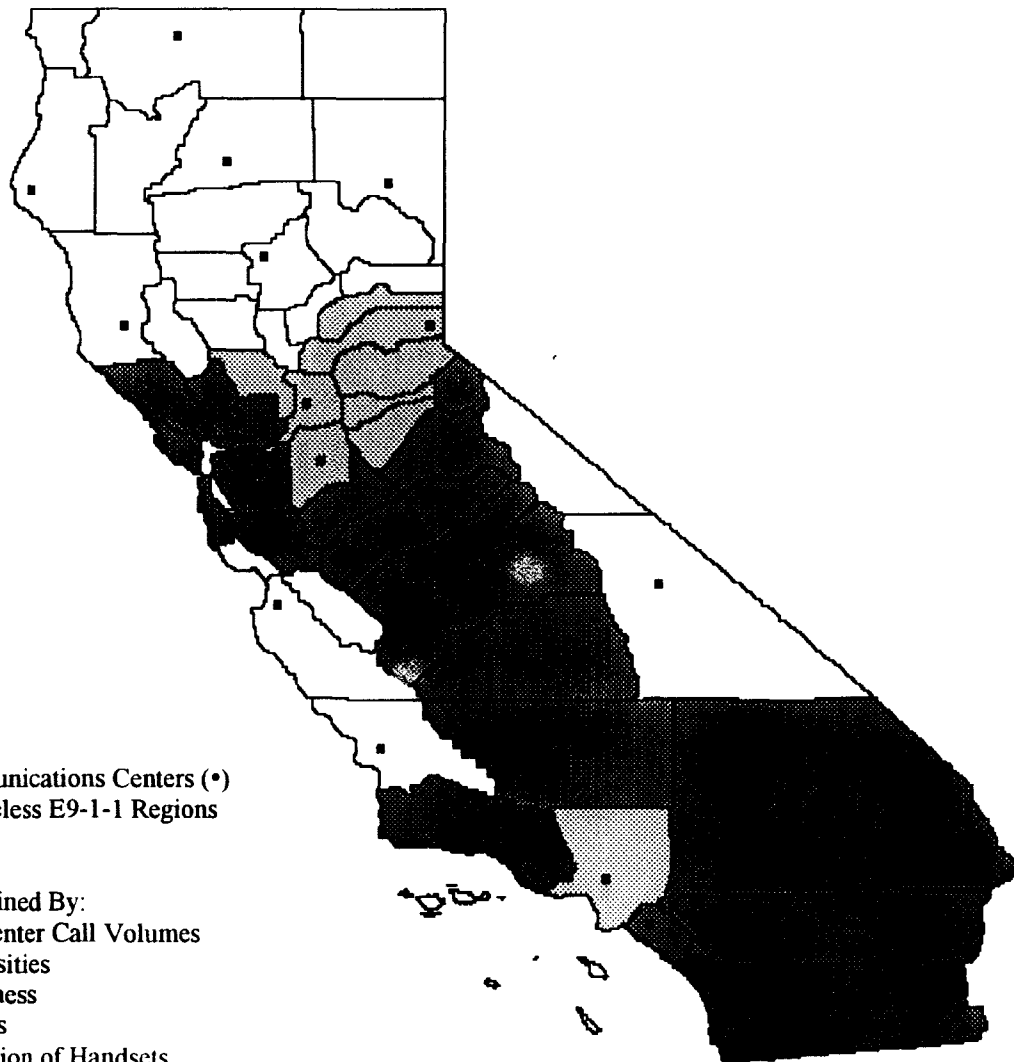
SLO Cellular, Inc. d/b/a
Cellular One of San Luis Obispo

Dated: ✓ 10-8-03

By: 
David Pruett,
Vice President

Wireless E 9-1-1 Statewide Plan Map

DGS, Telecom. Division
State 9-1-1 Office



Map Depicts:

- 58 Counties
- 24 CHP Communications Centers (•)
- 6 Defined Wireless E9-1-1 Regions (in Color)

Rollout Determined By:

- CHP Comm. Center Call Volumes
- Population Densities
- Network Readiness
- PSAP Readiness
- Market Penetration of Handsets

Los Angeles Region
Started 2nd Quarter 2003

Sacramento Region
Projected to Start in 2003

Sacramento/Stockton Region
Projected to Start in 2004

Southland Region
Projected to Start in 2004

Remainder of PSAPs
Projected to Start in 2005

Note: All implementations are being planned for Phase I and II together.